

Exhibit A

Proposed Motion to Dismiss Deadline Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER AUTHORITY,
Debtor.

PROMESA
Title III

No. 17 BK 4780-LTS

CORTLAND CAPITAL MARKET SERVICES LLC,
et al.,

Plaintiffs,

v.

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, *et al.*,

Defendants.

Adv. Pro. No. 19-396-LTS

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

SISTEMA DE RETIRO DE LOS EMPLEADOS DE
LA AUTORIDAD DE ENERGIA ELECTRICA,

Plaintiff,

v.

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, *et*
al.,

Defendants.

Adv. Pro. No. 19-405-LTS

**ORDER GRANTING URGENT CROSS-MOTION BY THE AD HOC GROUP OF
PREPA BONDHOLDERS, ASSURED GUARANTY CORP., ASSURED GUARANTY
MUNICIPAL CORP., NATIONAL PUBLIC FINANCE GUARANTEE CORPORATION,
AND SYNCORA GUARANTEE INC. TO ESTABLISH A CASE SCHEDULE AND
IMPOSE DEADLINES FOR A PREPA PLAN OF ADJUSTMENT**

Upon consideration of the *Urgent Cross-Motion by the Ad Hoc Group of PREPA Bondholders, Assured Guaranty Corp., Assured Guaranty Municipal Corp., National Public Finance Guarantee Corporation, and Syncora Guarantee Inc. to Establish a Case Schedule and Impose Deadlines for a PREPA Plan of Adjustment* (ECF No. __) (the “Scheduling Cross-Motion”)² filed in connection with the same parties’ *Response to the Oversight Board’s Urgent Motion to Set a Litigation Schedule*; the Court having found and determined that (i) the Court has jurisdiction to consider the Scheduling Cross-Motion and the relief requested therein; (ii) venue is proper before this Court pursuant to PROMESA section 307(a); (iii) due and proper notice of this Scheduling Cross-Motion has been provided under the particular circumstances and no other or further notice need be provided; (iv) based on the statements and arguments made in the Scheduling Cross-Motion, the relief requested in the Scheduling Cross-Motion is in the best interest of PREPA and its creditors; (v) any objections to the relief requested in the Scheduling Cross-Motion have been withdrawn or are hereby overruled; and (vi) the legal and factual bases set forth in the Scheduling Cross-Motion establish just cause for the relief granted herein.

Accordingly, it is hereby ORDERED THAT:

1. The Scheduling Cross-Motion is GRANTED as set forth herein.
2. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.
3. The Court shall consider the PREPA Bondholders’ Motion to Dismiss/Lift-Stay at a hearing to be held on a date of the Court’s choosing and on such briefing schedule that the Court proposes.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Scheduling Cross-Motion.

4. Litigation in Adversary Proceedings Nos. 19-391 (LTS), Nos. 19-396 (LTS), and 19-405 (LTS) shall remain stayed up and until the PREPA Bondholders' Motion to Dismiss/Lift-Stay is resolved.

5. The prior Receiver Motion [Dkt. No. 975 in Case No. 17-4780] is dismissed without prejudice as superseded by the PREPA Bondholders' Motion to Dismiss/Lift-Stay [stayed up and until the PREPA Bondholders' Motion to Dismiss/Lift-Stay is resolved].

6. For good cause shown, any party in interest may seek appropriate relief from this Order.

7. The terms of and conditions of this Order shall be immediately effective and enforceable upon its entry.

8. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

9. This Order resolves ECF No. ____ in Case No. 17-4780.

SO ORDERED.

Date: _____, 2022

HONORABLE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE